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BY FAX (212) 805-7925 & ECF

Honorable Robert W. Sweet
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: Sharif Stinson, et al. v. City of New York, et al.
10 Civ. 4228 (RWS)

Your Honor:

I am a Senior Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, and one of the attorneys representing defendants in the above-referenced matter. Defendants write in response to plaintiffs' letter, dated today, opposing defendants' request for an enlargement of time until September 11, 2015, to file their opposition to plaintiffs' motion for sanctions.

First, plaintiffs oppose defendants' request for an enlargement on the basis that defendants would be afforded too much time to oppose their sanctions motion if the Court were to grant the request for an enlargement. Defendants note that plaintiffs submitted their application for sanctions at their leisure and certainly without ever consulting with defendants on a briefing schedule for their motion. Furthermore, in light of the fact that plaintiffs are seeking almost a month to submit a simple reply, their opposition to the length of time needed by defendants is nonsensical. Second, plaintiffs cite the occurrence of the Jewish Holidays – Rosh Hashanah and Yom Kippur – as a basis to deny defendants' proposed briefing schedule. However, plaintiffs' legal team consists of numerous attorneys – many of whom, upon information and belief, do not celebrate these holidays. In fact, Ms. Sutton, the attorney who filed the sanctions motion, does not claim in her letter that she is *personally* unavailable due to the holidays. The fact that members of her team are Jewish and may celebrate Rosh Hashanah and Yom Kippur does not mean that a reply cannot still be submitted in a timely manner. The current schedule proposed by defendants affords plaintiffs 14 days, excluding the three business days for both Jewish holidays.

As plaintiffs have not set forth any creditable basis for their opposition to defendants' request, and in light of the seriousness of the relief plaintiffs are seeking, defendants

request that the Court grant their motion for a briefing schedule whereby defendants' opposition to plaintiffs' sanctions motion would be due by September 11, 2015, and plaintiffs' reply thereto would be due by September 28, 2015.

Thank you for your consideration herein.

Respectfully submitted,

/s/

Qiana Smith-Williams
Senior Counsel

cc: By ECF
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